

# Sales & Marketing Code of Practice

## Key Features

- Titan is a responsible company and adheres to all legislative and regulatory compliance issues, in conjunction with its internal compliance controls.
- Titan does not accept any forms of mis-selling or misrepresentation from anyone representing the company.
- Titan ensures that its advertising and campaign literature is regularly updated and is clear, concise, unambiguous, accurate, fair, and contains no false or misleading information regarding prices, savings, or benefits, of any products or services offered by Titan, or any of its competitors.
- Titan takes pride in its good reputation and expects its staff to be courteous and professional at all times, to be factual and accurate, to be able to explain the products and services provided by Titan, to be aware of the sales and marketing code of practice and to not misrepresent any services offered by other service providers.
- Titan offers all customers a consolidation period, which is the period from entering into the agreement until approximately two working days before supply commences. All customers are made aware of this period. No cost will be applied for accepted cancellations during this period.

This code of practice sets out the procedures that Titan Telecom adheres to in relation to its sales and marketing processes. Titan Telecom is a responsible company and recognises all legislative and regulatory compliance issues, in conjunction with its internal compliance controls. Titan Telecom's company registration number is 6445180.

The purpose of this code of practice is to ensure that Titan Telecom resolves any issues, which may arise before, during, and after the point of sale. Titan Telecom ensures that all customers entering into an agreement with Titan Telecom fully understand the nature of the Fixed Line Telecommunication Agreement and intend to proceed with the transfer. Titan Telecom does not tolerate any forms of mis-selling or misrepresentation from anyone representing the company.

All representatives of Titan Telecom, regardless of their position or job description, are made aware of the existence of the code of practice and informed of the contents of the code. Through management structures, representatives of Titan Telecom will be monitored and reviewed for their compliance with the code.

Titan Telecom ensures that we provide our customers with protection from harmful conduct arising from irresponsible sales and marketing activity. We also ensure good practice and responsible selling.

It is the intention of Titan Telecom to provide a clear and accurate picture of the operation of Titan Telecom, providing reassurance to customers as to what constitutes good practice in the Fixed Line Telecommunications Industry. Titan Telecom has provided copies of its Sales and Marketing Code of Practice to the Head Office of the Citizens Advice Bureau. The code is also available on the company's website ([www.titantelem.com](http://www.titantelem.com)) or upon request, free of charge.

The person responsible for compliance with the code within Titan Telecom is Wai Lee, who can be contacted by writing to The Compliance Manager, Titan Telecom, PO Box 844, Manchester, M22 4ZG or by emailing [compliance@titantelem.com](mailto:compliance@titantelem.com) or by telephoning 0844 257 0844.

## Status of Code

Titan Telecom publishes and adheres to this code on a voluntary basis, however, non-compliance with this code does not affect the validity of any contract between Titan Telecom and the customer, whether verbally agreed or signed.

## Sales, Marketing, Advertising and Promotion

Titan Telecom approaches potential customers in a number of different ways, including by post, by telephone, and in person.

Customers' legal rights regarding Telephone Preference Service (TPS), Corporate Telephone Preference Service (CTPS), Mail Preference Service (MPS), Facsimile Preference Service (FPS) and E-mail Preference Service (EPS) are respected and data used to contact customers is screened regularly.

Titan Telecom ensures that its advertising and campaign literature is regularly updated and is clear, concise, unambiguous, accurate and fair, and contains no false or misleading information regarding prices, savings, or benefits, of any products or services offered by Titan Telecom, or any of its competitors.

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## **Recruitment and Sales Training**

Titan Telecom recruits its sales and marketing staff and third party agencies on the basis that our sales and marketing representatives are the voice and face of Titan Telecom and the initial contact that its customers will receive. We believe that your first impressions are the ones that last. Titan Telecom will not tolerate any behaviour from any of our sales and marketing staff or third party agencies, which brings the good name of Titan Telecom into disrepute.

All prospective sales and marketing staff have background checks carried out into previous employment positions and any evidence of mis-selling or lack of integrity and any criminal convictions are taken into account.

All successful applicants complete training courses to ensure:

- A complete and accurate understanding of the Titan Telecom Fixed Line Telecommunication package.
- Awareness of the courteous behaviour and integrity expected of them at all times.
- Awareness of the code of practice and its contents, and their responsibility to comply with the code at all times.
- Awareness of GC24 and other relevant regulations.
- The complete awareness that mis-selling, misrepresentations, and disrespectful behaviour will not be tolerated and that any allegations made will be fully investigated in line with the company's code of conduct and its internal disciplinary procedures.

Titan Telecom also requires all of its representatives to maintain a high level of personal standards, in appearance, manner, and conduct.

Titan Telecom has a management structure in place that is fully responsible for the actions and conduct of its representatives and their compliance with the code of practice. Any allegations of misrepresentation or mis-selling against any member of the Titan Telecom sales teams should be reported to: Wai Lee, Compliance Manager, Titan Telecom, PO Box 844, Manchester, M22 4ZG; or by emailing [compliance@titantelecom.uk.com](mailto:compliance@titantelecom.uk.com); or by telephoning 0844 257 0844.

We also have stringent checks to ensure that each employee recruited by Titan Telecom is identified by providing his or her national insurance number and an authorised proof of address. Titan Telecom also requests that two independent references are provided from different former employers, to ensure there has been no previous history of sales related misconduct. Titan Telecom conducts regular assessments of office based and field sales staff and continuously monitors their performance. Titan Telecom will make all reasonable endeavours to retrieve all company literature, paperwork and identification badges from any representative leaving the company.

As part of the training for new and existing sales representatives, Titan Telecom provides a sufficient understanding into the process of ordering the telecommunication service. Titan Telecom recognises the consumer protection laws and provides an awareness of these laws to its representatives. As part of the training course Titan Telecom ensures its representatives are fully aware of the contract, the duration of supply, the terms and conditions of supply, and any termination fees applicable for the early termination of the agreement. They are also trained in the correct procedure for the cancellation of customer agreements and the handling of customer complaints.

Titan Telecom documents all remuneration systems, which are designed in a manner to encourage responsible sales practice.

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## **Customer Contact**

Titan Telecom does not visit or make telephone calls to customers outside the hours of 8.00am to 8.00pm, unless at the customer's request.

If we call you, we will let you know who we are at the beginning of the call. We will also let you know why we are calling, and how long we expect the call to last. If you do not want us to continue, we will immediately end the call.

Each representative of Titan Telecom involved in face-to-face contact with customers is issued with a company identification badge, which clearly displays the representative's photograph, name and unique identification number, and expiry date.

Upon arrival at an appointment, the representative will immediately identify himself or herself as a representative of Titan Telecom, show the customer the identification badge, and advise the customer of the expected duration of the meeting.

Titan Telecom takes pride in its good reputation and expects its staff:

- To be courteous and professional at all times.
- To be factual and accurate.
- To be able to explain the products and services provided by Titan Telecom.
- To be aware of and comply with its sales and marketing code of practice.
- Not to misrepresent any services offered by Titan Telecom or other service providers.

If any contact with a customer is inconvenient or unwelcome, discussions will be ceased immediately. Any customer who wishes to have no further contact from Titan Telecom can request the removal of their details from our marketing database by writing to: The Database Department, Titan Telecom, PO Box 844, Manchester, M22 4ZG.

Titan Telecom will not direct its marketing activities to those who are under the legal age of entitlement to enter into a contract and will not abuse the trust of vulnerable customers.

Titan Telecom retains the records of all customer contacts for a period of not less than 6 months and all information, including the sales person's details, are recorded on our database.

## **Entering into a Contract – Information, Order Forms and Contracts**

Titan Telecom takes all reasonable steps, whether it is in person or over the phone, to ensure the person agreeing to the contract is authorised to enter into an agreement for telecommunication services on behalf of the customer, and that the person entering into a contract understands and intends to enter into the contract.

Titan Telecom has designed all of its contractual documentation in a specific manner to ensure that the contractual nature of the document is clear and concise.

Where a representative meets the customer in person, the declaration statement is adjacent to where the customer signs their acceptance. The features of the contract are clearly stated on the front of the agreement, with the terms and conditions on the reverse. The customers sign over the word "contract".

Where a representative visits the customer, the Titan Telecom contracts are set out in such a format, which provides the customer with an overview of the contract and general terms of supply. It is the customer's responsibility to review the contract and its terms and conditions, and ask questions regarding any aspects of which they are unclear, prior to their acceptance of the contract. The below features appear clearly on the contract:

- Contact details for the Company, including its postal address, telephone number, facsimile number, email address, and website address.
- Minimum period of supply.
- Features of Service, including charges for local and national calls, reference to pricing sheets.
- Payment terms.
- Termination procedures and fees, which may be applicable.
- Customer Service opening hours.

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Titan Telecom provides all customers with an information booklet which provides details on the headline rates of the service and clearly displayed website address to find the full pricing details for Titan Telecom.

Titan Telecom offers all customers a consolidation period, which is the period from entering into the agreement until approximately two working days before supply commences. All customers are made aware of this period. No cost will be applied for accepted cancellations during this period. Requests for cancellation should be made by telephone to the customer service department on 0844 257 0844, by writing to Customer Services, Titan Telecom, PO Box 844, Manchester, M22 4ZG, by facsimile to 0844 257 0845, or by email to [info@titantelecom.uk.com](mailto:info@titantelecom.uk.com).

Cancellation requests outside of this period will be referred to the terms and conditions of the customers' contracts.

All Titan Telecom customers will receive a communication prior to the commencement of the switchover of service providers. This letter explains the customers' right to cancel without cost during the transfer period. This communication will contain contact details for our customer services department, including the full postal address, telephone number, facsimile number, and email address.

## **Audits**

Titan Telecom will carry out regular checks on all aspects of the training of sales and marketing staff, paperwork, recordings, company documentation and the procedures involved. We will also carry out checks on a regular basis of all correspondence and information provided to customers by Titan Telecom. Titan Telecom will ensure that we are acting compliantly with all aspects of this code.

Our customer contracts are stringently checked upon receipt to ensure that the paperwork has been completed correctly, that documents have been signed by the customer where appropriate, and that no unauthorised amendments have been written on any contractual documents, by either the company representative or the customer. If any unauthorised amendments are found on any contractual documents then we will reject these contracts and the relevant sales department will be informed.

## **Customer Complaints Procedure**

Any customer complaints relating to our sales and marketing procedures should be made in the first instance to Wai Lee, Compliance Manager, Titan Telecom, PO Box 844, Manchester, M22 4ZG or by emailing [compliance@titantelecom.uk.com](mailto:compliance@titantelecom.uk.com) or by telephoning 0844 257 0844. Upon receipt of a complaint, an internal investigation will be conducted and we aim to provide a resolution to the customer within 28 days.

If the customer believes that their complaint has not been dealt with satisfactorily then they should then write to The Managing Director, Titan Telecom, PO Box 844, Manchester, M22 4ZG. The Managing Director will endeavour to provide a All complaints against our sales and marketing staff, which are upheld, will be drawn to the attention of the Managing Director for internal disciplinary action.

Titan Telecom is a member of the Alternative Dispute Resolution (ADR) scheme run by the Office of the Telecommunications Ombudsman (Otel). Customers should only contact Otel if a complaint made in accordance with the above procedures has not been dealt with to the customer's satisfaction. Otel may refuse to accept the complaint if the above procedure has not been followed, and Titan Telecom has not been given a fair chance to resolve the complaint. Otel may request a "deadlock" letter to be issued, and wait until after a period of 8 weeks has elapsed from the date that the complaint was first made. The ADR scheme run by Otel is only available to customers whose total annual expenditure including line rental, calls, and VAT, is less than £5,000 per annum.

## **Distributing the Code: Creating Awareness**

Titan Telecom has taken steps to advise all members of staff and representatives, regardless of their position within the company, of the existence of the Code of Practice. This code is available via the company's internal intranet and is available on the company's website. The code is also available to all customers upon request, free of charge.

Titan Telecom has passed details of its Code of Practice to Ofcom, Otel, and the Head Office of the Citizens Advice Bureau.